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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**
13

14 IN RE HIGH-TECH EMPLOYEE
15 ANTITRUST LITIGATION

16 THIS DOCUMENT RELATES TO:
17 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION VICTORIA L.
WEATHERFORD IN SUPPORT OF
APPLE INC.'S MOTION FOR SUMMARY
JUDGMENT**

Date: March 20, 2104 and
March 27, 2014
Time: 1:30 p.m.
Courtroom: 8, 4th Floor
Judge: The Honorable Lucy H. Koh

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2 I, Victoria L. Weatherford, declare as follows:

3 1. I am a member of the Bar of the State of California and an associate of the law
4 firm of O'Melveny & Myers LLP, attorneys for Defendant Apple Inc. I submit this declaration in
5 support of Defendant Apple Inc.'s Notice of Motion and Motion for Summary Judgment. I make
6 this declaration based on my own personal knowledge. If called to testify as a witness, I could
7 and would do so competently.

8 2. Attached hereto as Exhibit 1 is a true and correct copy of transcript excerpts from
9 the deposition of Matthew Marx taken November 15, 2013.

10 3. Attached hereto as Exhibit 2 is a true and correct copy of the Apple Inc.'s
11 Amended Responses to Plaintiffs' Second Set of Interrogatories, dated March 29, 2013.

12 4. Attached hereto as Exhibit 3 is a true and correct copy of the Adobe Systems Inc.'s
13 Amended Response to Plaintiffs' Second Set of Interrogatories, dated March 19, 2012.

14 6. Attached hereto as Exhibit 4 is a true and correct copy of document produced by
15 Apple Inc., bearing Bates numbers 231APPLE0002143 through 231APPLE0002144.

16 7. Attached hereto as Exhibit 5 is a true and correct copy of transcript excerpts from
17 the deposition of Danielle Lambert taken October 2, 2012.

18 8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Supplemental
19 Answers and Objections to Defendants' Second Set of Interrogatories, dated May 24, 2013.

20 9. Attached hereto as Exhibit 7 is a true and correct copy of transcript excerpts from
21 the deposition of Mark Bentley taken August 23, 2012.

22 10. Attached hereto as Exhibit 8 is a true and correct copy of the Expert Report of
23 Professor Kevin M. Murphy, dated November 25, 2013.

24 11. Attached hereto as Exhibit 9 is a true and correct copy of transcript excerpts from
25 the deposition of Ann Reeves taken March 29, 2013.

26 12. Attached hereto as Exhibit 10 is a true and correct copy of transcript excerpts from
27 the deposition of Eric Schmidt taken February 20, 2013.
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